

Exhibit E

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
GREENVILLE DIVISION

Wesley S. Mullinax, Billy Wesley Owen)	
Addis, William D. Smith, Jr., and John T.)	
Cox, all individually and on behalf of all)	
other similarly situated individuals,)	Civil Action No. 6:12-cv-01405-TMC
)	
Plaintiffs,)	
)	
vs.)	
)	
Parker Sewer & Fire Subdistrict,)	
)	
Defendant.)	
_____)	

UNSWORN DECLARATION IN SUPPORT OF PLAINTIFF'S
MOTION FOR ATTORNEY'S FEES

W. Andrew Arnold states that he is an adult over the age of eighteen (18) years of age, that the factual matters herein are true and correct to the best of his knowledge, and that the opinions expressed herein are provided in good faith and are honestly held by the declarant:

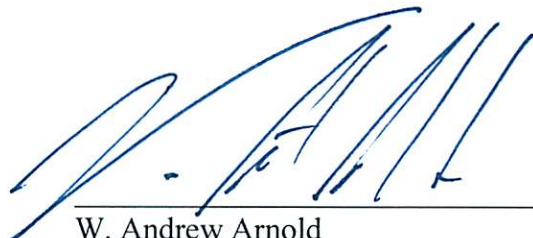
1. I am a 1992 graduate of the University of South Carolina School of Law with honors and have practiced primarily in the area in the area of employment law during the past ten years. I was employed by a defense firm for approximately two (2) years after graduating. Since 1994, I have represented primarily plaintiffs in employment litigation. I am licensed to practice law before the following courts: The United States Court of Appeals for the Fourth Circuit; the United States District Court for the District of South Carolina; and all courts in the State of South Carolina. I am listed in both Best Lawyers and Super Lawyers.

2. Since October 1992 I have practiced in Greenville, South Carolina. I am familiar with or know well most of the employment law practitioners throughout the state.
3. I have known David Rothstein for the last 10 years. We have consulted together about employment law issues, and I have observed him directly while serving as a mediator on one of his cases.
4. Mr. Rothstein has an outstanding reputation and is considered a top employment law practitioner in South Carolina. I got to know Mr. Rothstein better after he moved to the Upstate. In my dealings with Mr. Rothstein, he has exhibited a thorough knowledge of employment law, although he is particularly impressive in his understanding of matters arising under the Fair Labor Standards Act. Mr. Rothstein is a certified specialist in South Carolina for labor and employment law.
5. In preparing this declaration, I have reviewed the motion and docket entries on PACER for this matter. I have represented clients in wage and hour cases, including one collective action.
6. I have reviewed Mr. Rothstein's petition for attorney's fees. In my opinion, the time spent on this matter and the amount of fees requested are more than reasonable. I believe the fee petition is fair in light of the complexity of this matter, the skill and knowledge required to successfully represent Plaintiffs in such an action, and the risks associated with accepting Plaintiffs' employment cases.
7. Counsel of employee-plaintiffs practice in a market where hourly fees arrangements are beyond the means of most of our clients. The contingency fee is instrumental to funding attorney's fees in state and federal employment law cases. During my 21 years of

practice, I have accepted more than a couple hundred employment cases on a contingency fee. Some I have lost. The risk of loss (or varied other negative outcomes) can be significant for a solo practitioner like myself and Mr. Rothstein. A one-third (33.33%) contingency fee is standard in my practice and most comparable practices, except in those cases where legal counsel agrees to advance the expenses for a case. In those cases, the fee is generally equal to forty percent (40%) of the gross amount recovered. The proposed 30% fee proposed in the motion for attorney's fees is reasonable and below average for cases accepted on a contingency fee. This rate is more reasonable considering that Mr. Rothstein is a certified specialist in employment law with extensive skills and experience. In addition to the fee, these arrangements require the reimbursement of any incurred expenses and costs.

8. I believe based upon the outcome, the risk taken, the hours expended and the policy objectives served by the FLSA, the fee sought in this case is fair and reasonable.
9. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. 28 U.S.C. § 1746.

Dated January 13, 2014.



W. Andrew Arnold
Federal I.D. 65311